

1 THE HONORABLE JAMES L. ROBART
2
3
4
5
6
7
8

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 ROCKFISH, INC., a Washington Corporation,
10 Plaintiff,

11 v.
12

13 UNIDENTIFIED WRECKED AND
14 ABANDONED VESSEL, her engines, boilers,
apparel, tackle, equipment, appurtenances and
cargo, *in rem*,

15 Defendant.
16

IN ADMIRALTY

CASE NO.: 22-cv-1659-JLR

**STIPULATED MOTION FOR
RELIEF FROM DEADLINE TO
FILE SALVAGE PLAN**

**NOTE ON MOTION CALENDAR:
FEBRUARY 21, 2023**

17 Plaintiff Rockfish, Inc. (“Rockfish”) and claimants Mitchell Moody, Donald Foster,
18 and London Market Insurers (collectively the “Parties”) stipulate to the entry of an order
19 extending by two weeks the deadline for Rockfish to file a salvage plan.

20 On November 23, 2022, this Court ordered Rockfish to, within 90 days (i.e., no later than
21 February 21, 2023), submit a salvage plan. See Order (Dkt. #7) ¶ 13. The Court noted the salvage
22 plan may be submitted under seal if the criteria for sealing are met. Id.

23 The salvage plan Rockfish prepared contains confidential information concerning the
24 location and disposition of the wreck of the defendant Wrecked and Abandoned Vessel. As a
25 result, the parties are currently engaged in discussions regarding entering into a stipulated
26 protective order and are also conferring in an attempt to reach agreement on the need to file the

1 salvage plan under seal and to explore redaction and other alternatives to filing under seal.
2 The parties believe if the deadline for Rockfish to file the salvage plan is extended by two weeks,
3 they may be able to reach agreement on these issues, potentially avoiding the need to engage in
4 motion practice. Accordingly, the Parties respectfully request the Court extend by two weeks
5 the deadline for Rockfish to file a salvage plan.

6
7 DATED this 21st day of February, 2023.

8 NICOLL BLACK & FEIG PLLC

Per 02/21/23 Email Authority

9
10 /s/ Jeremy B. Jones
Jeremy B. Jones, WSBA No. 44138
11 *Attorneys for Plaintiff*

/s/ Mitchell S. Moody
Mitchell S. Moody

12 KRAFT DAVIES OLSSON, PLLC
13 *Per 02/21/23 Email Authority*

LANE POWELL PC
Per 02/21/23 Email Authority

14 /s/ Marissa A. Olsson
Richard J. Davies, WSBA No. 25365
15 Marissa A. Olsson, WSBA No. 43488
16 *Attorneys for Donald W. Foster*

/s/ Katie Smith Matison
Katie Smith Matison, WSBA No. 20737
Erika O'Sullivan, WSBA No. 57556
Attorneys for London Market Insurers

ORDER

Based upon the Parties' Stipulation, and the Court being fully advised in the premises, it is now, therefore, ORDERED that the deadline for Rockfish to submit a salvage plan is extended by two weeks. Rockfish must file the salvage plan no later than March 7, 2023.

DATED this 22nd day of February, 2023.

UNITED STATES DISTRICT JUDGE